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CLERK, U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY

UNITED STATES DISTRICT COURT FOR  
THE CENTRAL DISTRICT OF CALIFORNIA

CV12-9478 DDP(SSX)

CORWIN D. JACKSON,

Plaintiff,

vs.

CREDIT MANAGEMENT, LP,

Defendant.

COMPLAINT AND DEMAND FOR JURY  
TRIAL  
(Unlawful Debt Collection Practices)

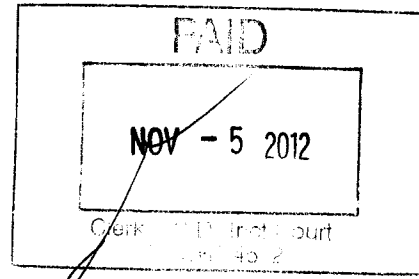
VERIFIED COMPLAINT

Corwin Jackson (Plaintiff) alleges the following against Credit Management, LP  
(Defendant).

INTRODUCTION

Count I of Plaintiff's Complaint is based on the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (FCRA).

Count II of Plaintiff's Complaint is based on the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.* (TCPA).



NOV - 5 2012

1 Count III of Plaintiff's Complaint is based on the Fair Debt Collections Practices Act, *15 U.S.C.*  
2 *§1692 et seq.* (FDCPA).

3 Count IV of Plaintiff's Complaint is based on the Rosenthal Fair Debt Collection Practices Act,  
4 *Cal. Civ. Code § 1788 et seq.* (RFDCPA).

### 5 JURISDICTION

6 Jurisdiction of this court arises pursuant to *15 U.S.C. § 1681 p*, *15 U.S.C. 1692 k(d)*, *47 U.S.C. §*  
7 *227*, *28 U.S.C. §1331*, and *Cal. Civ. Code § 1788*.

8 All conditions precedent to the bringing of this action have been performed.

### 9 VENUE

10 The occurrences which give rise to this action occurred in L.A. County, California, and Plaintiff  
11 resides in L.A. county California.

12 Venue is proper in the Central District of California.

### 13 PARTIES

14 Plaintiff is a natural person who resides in L.A. County, California.

15 The Defendant is Credit Management, LP. An unknown entity with offices at 4200 International  
16 Parkway Carrollton, Texas 75007-1912.

17 Defendant is a debt collector as that term is defined by *15 U.S.C. § 1692 a(6)* and *Cal. Civ. Code*  
18 *§ 1788.2(c)*.

19 Defendant acted through its agents, employees, officers, members, directors, heirs, successors,  
20 assigns, principals, trustees, subrogees, sureties, representatives, and insurers.

21 Discovery of violations brought forth herein occurred in July 2012 and are within the statute of  
22 limitations as defined in the FCRA *15 U.S.C. § 1681 p*.

### 23 FACTUAL ALLEGATIONS

24 Plaintiff obtained his consumer credit reports from the three major credit reporting agencies and  
25 found entries by entities that he was unfamiliar with in the reports.

1 Plaintiff found after examination of his Trans Union consumer credit report that Defendant  
2 Credit Management, LP had obtained Plaintiff's Trans Union consumer credit report on February  
3 24, 2012.

4 Defendant contacted Plaintiff at 619-723-3057.

5 Defendant contacted Plaintiff from 619-757-2359.

6 Plaintiff sent a dispute letter to the 3 major consumer credit reporting agencies on July 5 2012.

7 Plaintiff contacted Defendant and spoke to an employee of Credit Management, LP on July 16,  
8 2012.

9 Defendant was told no debt was owed to Credit Management, LP and that they did not have  
10 permission to call and to cease calling said phone number. Calls continued on July 18, 2012.

11 Plaintiff sent a dispute letter on July 19, 2012 asking to validate debt. Letter was received by  
12 Credit Management, LP on July 23, 2012 according to USPS records.

13 Defendant did not send Plaintiff a debt validation letter.

14 Trans Union forwarded information about the Plaintiff's dispute to Credit Management, LP.

15 Plaintiff received a letter from Defendant dated August 24, 2012 stating, "This account has been  
16 removed from collections. A request was sent to the three national credit bureaus to have this  
17 account removed from your credit file. This account is closed with our office."

18 Plaintiff sent a notice to Credit Management, LP of their violations of the FCRA, TCPA,  
19 FDCPA, and the RFDCPA. This was in an effort to mitigate damages and reach a settlement  
20 agreement for their violations of these federal and state statutes before taking civil action against  
21 them. Plaintiff has not come to a satisfactory settlement agreement with Defendant regarding  
22 said notice.

## 23 **COUNT I**

### 24 **DEFENDANT VIOLATED THE FAIR CREDIT REPORTING ACT**

25 Counts I through IV are re-alleged as though fully set forth herein.

26 Plaintiff is a consumer within the meaning of the FCRA 15 U.S.C. § 1681 a(c).

1 Trans Union is a credit reporting agency within the meaning of the FCRA 15 U.S.C. § 1681 a(f).

2 Consumer credit report is a consumer report within the meaning of the FCRA 15 U.S.C. § 1681  
3 a(d).

4 The FCRA 15 U.S.C. § 1681b defines the permissible purpose for which a person may obtain a  
5 consumer credit report.

6 Such permissible purposes as defined by 15 U.S.C. § 1681b are generally, if the consumer makes  
7 application for employment, makes application for credit, for underwriting of insurance  
8 involving the consumer, or is offered a bona fide offer of credit as a result of the inquiry.

9 Plaintiff has never had any business dealings or any accounts with, made application for credit  
10 from, made application for employment with, applied for insurance from, or received a bona fide  
11 offer of credit from the Defendant Credit Management, LP.

12 At no time did Plaintiff give his consent for Defendant to acquire his consumer credit report from  
13 any credit reporting agency.

14 The actions of Defendant obtaining the consumer credit report of the Plaintiff with no  
15 permissible purpose or Plaintiff's consent was a willful and knowing non-compliance violation  
16 of the FCRA 15 U.S.C. § 1681b and an egregious violation of Plaintiff's right to privacy.

17 At no time has Credit Management, LP ever indicated what justification they may have had for  
18 obtaining Plaintiff's credit report.

19 The Defendant had a duty to properly ascertain if there was any legitimate permissible purpose  
20 before obtaining Plaintiff's credit report and Defendant breached said duty by failing to do so.

21 There was no account that the Defendant had any right to collect to have had permissible purpose  
22 to obtain Plaintiff's credit report and therefore Plaintiff is entitled to damages for breach of said  
23 duty.

24 On February 24, 2012 Defendant obtained the Trans Union consumer credit report from the  
25 Plaintiff with no permissible purpose in violation of the FCRA 15 U.S.C. § 1681 b.

26

1 Said actions thereby damaged Plaintiff by causing Plaintiff's credit score to decline resulting in  
2 Plaintiff being denied credit and having to pay high security deposits.

3 **WHEREFORE**, Plaintiff Corwin Jackson respectfully requests judgment be entered against  
4 Credit Management, LP for the following:

- 5 1. Statutory damages pursuant to *15 U.S.C. §1681 n.*
- 6 2. Actual damages.
- 7 3. Costs and reasonable attorneys' fees.
- 8 4. Any other relief that this Honorable Court deems appropriate.

9 **COUNT II**

10 **DEFENDANT VIOLATED THE TELEPHONE CONSUMER PROTECTION ACT 47**

11 **U.S.C. §227**

12 Defendant violated the TCPA based on the following:

- 13 a. Defendant Credit Management, LP has demonstrated willful or knowing non-  
14 compliance with *47 U.S.C. § 227(b)(1)a* by using an automated telephone dialing system  
15 to call Plaintiff's number, which is assigned to a cellular telephone service.
- 16 b. Defendant Credit Management, LP called Plaintiff 40 times from June 16, 2012 to  
17 August 23, 2012. These are 40 separate violations of *47 U.S.C. § 227(b)(1)a* and Plaintiff  
18 is entitled to damages of \$1500 per violation pursuant to *47 U.S.C.*  
19 *§ 227(b)(3)(B)*. See EXHIBIT A.

20 **WHEREFORE**, Plaintiff Corwin Jackson respectfully requests judgment be entered against  
21 Credit Management, LP for the following:

- 22 1. Statutory damages pursuant to *47 U.S.C. § 227(b)(3)(B)*.
- 23 2. Actual damages.
- 24 3. Costs and reasonable attorneys' fees.
- 25 4. Any other relief that this Honorable Court deems appropriate.
- 26

**Exhibit A****DEBT COLLECTION CALL MANAGEMENT LOG**

DATE	TIME OF CALL	CALLER ID #	CALLER/COMPANY NAME	LIST COMMENTS OF WHAT WAS SAID AND DETAILS
SAT 16 Jun 12	5:30 pm	619-757-2359	CREDIT MGMT SUCS. (CMI)	Robo call / Automated Dialer / hang up
THURS 21 Jun 12	1:17 pm	same	same	same
FRI 22 Jun 12	5:21 pm	same	same	same
SAT 23 Jun 12	11:57 am	same	same	same
SUN 24 Jun 12	8:49 pm	same	same	same
TUES 26 Jun 12	11:26 am	same	same	same
THURS 28 Jun 12	3:32 pm	same	same	same
SAT 30 Jun 12	4:48 pm	same	same	same
TUES 03 Jul 12	12:10 pm	same	same	same
FRI 06 Jul 12	10:45 am	same	same	same
FRI 06 Jul 12	7:55 pm	same	same	same
SAT 07 Jul 12	6:35 pm	same	same	same
MON 09 Jul 12	11:19 am	same	same	same
MON 09 Jul 12	7:50 pm	same	same	same
WED 11 Jul 12	6:47 pm	same	same	same
FRI 13 July 12	10:22 am	same	same	same
FRI 13 July 12	7:27 pm	same	same	same
MON 16 July 12	12:04 pm	same	same	same

Called back on July 16 @ 6:52 pm - spoke to  
 Cecilia @ Credit Management Inc. Services

same

same

same

 11:47 am  
 and 7:52 am

Wed 18 Jul 12

Exhibit A.1

## DEBT COLLECTION CALL MANAGEMENT LOG

DATE	TIME OF CALL	CALLER ID #	CALLER/COMPANY NAME	LIST COMMENTS OF WHAT WAS SAID AND DETAILS
SAT Jul 21	4:01 pm	same	Credit Management (CMI)	Robo Call / Automated Dialer / hang up
Mon Aug 06	4:20 p	same	CMI	hang up
Tues Aug 7	5:07 p	same	CMI	hang up
Tues Aug 7	7:09 p	same	CMI	hang up
Wed Aug 8	8:16 AM	same	CMI	hang up
Wed Aug 8	10:23 AM	same	CMI	hang up
Thurs Aug 9	2:16 pm	same	CMI	hang up
Fri Aug 10	7:25 pm	same	CMI	hang up
Fri Aug 10	8:33 am	same	CMI	hang up
Sat Aug 11	1:43 pm	same	CMI	hang up
Mon Aug 13	11:37 am	same	CMI	hang up
Tues Aug 14	11:49 am	same	CMI	hang up
Wed Aug 15	10:45 am	same	CMI	hang up
Friday Aug 17	1:32 pm	same	CMI	hang up
Mon Aug 20	9:44 am	same	CMI	hang up
Mon Aug 20	7:36 pm	same	CMI	hang up
Tues Aug 21	10:43 am	same	CMI	hang up
Wed Aug 22	8:27 AM	same	CMI	hang up

#26

#33

#38

hang up

hang up

same

same

8:50 am

7:20 pm

Thurs Aug 23

Thurs Aug 23

#40



**COUNT III**

**DEFENDANT VIOLATED THE FDCPA**

Defendant violated the FDCPA based on the following:

- a. Defendant violated §1692d of the FDCPA by engaging in conduct the natural consequence of which is to harass, oppress, and abuse Plaintiff.
- b. Defendant violated §1692d(5) of the FDCPA when Defendant caused Plaintiff's phone to ring repeatedly and continuously with the intent to annoy, abuse, and harass Plaintiff.
- c. Defendant violated § 1692d(6) of the FDCPA because Defendant engaged in placement of calls without meaningful disclosure of caller's identity each time Defendant hung up when Plaintiff answered.
- d. Defendant violated FDCPA §1692g(a)(1-5) by failing to provide appropriate notice of the debt within 5 days after the initial communication including:
  - e. The amount of the debt
  - f. The name of the creditor, to whom the debt is owed.
  - g. A statement that unless the consumer, within 30 days after receipt of the notice, disputes the validity of the debt, or any portion thereof, the debt will be assumed to be valid by the debt collector.
  - h. A statement that if the consumer notifies the debt collector in writing within the 30 day period that the debt, or any portion thereof, is disputed, the debt collector will obtain verification of the debt or a copy of a judgment against the consumer and a copy of such verification or judgment will be mailed to the consumer by the debt collector.
  - i. A statement that, upon the consumer's written request within the 30 day period, the debt collector will provide the consumer with the name and address of the original creditor, if different from the current creditor.

1 **WHEREFORE**, Plaintiff Corwin Jackson respectfully requests judgment be entered  
2 against Credit Management, LP for the following:

- 3 1. Statutory damages pursuant to the FDCPA *15 U.S.C. § 1692k*
- 4 2. Actual Damages.
- 5 3. Costs and reasonable attorneys' fees pursuant to the FDCPA *15 U.S.C. § 1692k*
- 6 4. Any other relief that this Honorable Court deems appropriate.

7  
8 **COUNT IV**

9 **DEFENDANT VIOLATED THE ROSENTHAL FAIR DEBT COLLECTION**  
10 **PRACTICES ACT**

11 Plaintiff repeats and re-alleges all of the allegations in Count II of Plaintiff's complaint as  
12 well as the allegations in Count III of Plaintiff's complaint.

13 Defendant violated the RFDCPA based on the following:

- 14 a. Defendant violated §1788.11(e) of the RFDCPA by placing collection calls to  
15 Plaintiff with such frequency that was unreasonable and constituted  
16 harassment.
- 17 b. Defendant violated §1788.11(d) of the RFDCPA by causing Plaintiff's phone  
18 to ring repeatedly and continuously as to annoy Plaintiff.
- 19 c. Defendant violated §1788.11(b) of the RFDCPA by placing telephone calls  
20 without the disclosure of the caller's identity.

1 **WHEREFORE**, Plaintiff Corwin Jackson respectfully requests judgment be entered  
2 against Credit Management, LP for the following:

- 3
- 4 1. Statutory damages pursuant to the Rosenthal Fair Debt Collection Practices  
5 Act *Cal. Civ. Code §1788.30(b)*  
6 2. Actual Damages.  
7 3. Costs and reasonable attorneys' fees pursuant to the Rosenthal Fair Debt  
8 4. Any other relief that this Honorable Court deems appropriate.
- 9

10

11 **DEMAND FOR JURY TRIAL**

12

13 PLEASE TAKE NOTICE that Plaintiff Corwin Jackson demands a jury trial in this case.

14 RESPECTFULLY SUBMITTED

15 DATED: November 5 2012

16

17

18 By: 

19

20

21

22

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24

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26

**VERIFICATION OF COMPLAINT AND CERTIFICATION**

Plaintiff, Corwin Jackson states as follows:

1. I am the Plaintiff in this civil proceeding.
2. I believe that this civil Complaint is well grounded in fact and warranted by existing law or by a good faith argument for the extension, modification or reversal of existing law.
3. I believe that this civil Complaint is not interposed for any improper purpose, such as to harass any Defendant(s), cause any unnecessary delay to any Defendant(s), or create a needless increase in the cost of litigation to any Defendant(s), named in the Complaint.
4. I have filed this Complaint in good faith and solely for the purposes set forth in it.
5. Each and every exhibit I have attached to this Complaint is a true and correct copy of the original.
6. Except for clearly indicated redactions made by my attorney where appropriate, I have not altered, changed, modified or fabricated these exhibits, except that some of the attached exhibits may contain some of my own handwritten notations.

Pursuant to 28 U.S.C. § 1746(2), I, Corwin Jackson, hereby declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct.



CORWIN JACKSON

DATE Nov. 5, 2012

Name & Address: CREDIT MANAGEMENT, LP  
4200 INTERNATIONAL PKWY  
CARROLLTON, TX 75007-1912

**FOR OFFICE USE ONLY**

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

CORWIN D. JACKSON

CASE NUMBER

**CV12-9478**

PLAINTIFF(S)

v.

CREDIT MANAGEMENT, LP

**SUMMONS**

DEFENDANT(S).

**FOR OFFICE USE ONLY**

TO: DEFENDANT(S)

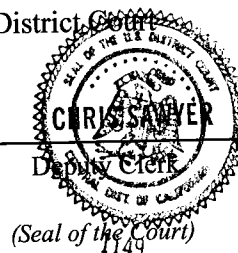
A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, CORWIN D. JACKSON, whose address is 5121 ROSEMEAD BLVD. APT O SAN GABRIEL, CA 91776. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: Nov. 5, 2012

By: \_\_\_\_\_



[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3).]

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY**

This case has been assigned to District Judge Dean D. Pregerson and the assigned discovery Magistrate Judge is Suzanne H. Segal.

The case number on all documents filed with the Court should read as follows:

**CV12- 9478 (DDP (SSx))**

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

=====

**NOTICE TO COUNSEL**

*A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).*

Subsequent documents must be filed at the following location:

☒ **Western Division**  
312 N. Spring St., Rm. G-8  
Los Angeles, CA 90012

☐ **Southern Division**  
411 West Fourth St., Rm. 1-053  
Santa Ana, CA 92701-4516

☐ **Eastern Division**  
3470 Twelfth St., Rm. 134  
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

**I (a) PLAINTIFFS** (Check box if you are representing yourself ☒)  
CORWIN D. JACKSON

**DEFENDANTS**  
CREDIT MANAGEMENT, LP

**(b) Attorneys** (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)  
CORWIN D. JACKSON

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an X in one box only.)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** - For Diversity Cases Only  
(Place an X in one box for plaintiff and one for defendant.)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

**IV. ORIGIN** (Place an X in one box only.)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify): ☐ 6 Multi-District Litigation ☐ 7 Appeal to District Judge from Magistrate Judge

**V. REQUESTED IN COMPLAINT:** **JURY DEMAND:** ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)

**CLASS ACTION under F.R.C.P. 23:** ☐ Yes ☐ No

**MONEY DEMANDED IN COMPLAINT:** \$ \_\_\_\_\_

**VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)  
Violations of the FCRA (15 U.S.C. 1681 et seq.), FDCPA (15 U.S.C. 1692 et seq.) RFDCPA (Cal. Civ. Code 1788 et seq.), and TCPA (47 U.S.C. 227 et seq.)

**VII. NATURE OF SUIT** (Place an X in one box only.)

OTHER STATUTES	CONTRACT	TORTS	TORTS	PRISONER PETITIONS	LABOR
<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <b>BANKRUPTCY</b> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <b>FORFEITURE/PENALTY</b> <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

**CV12-9478**

**FOR OFFICE USE ONLY:** Case Number: \_\_\_\_\_

**AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.**



**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA**  
**CIVIL COVER SHEET**

**VIII(a). IDENTICAL CASES:** Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes  
 If yes, list case number(s): \_\_\_\_\_

**VIII(b). RELATED CASES:** Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes  
 If yes, list case number(s): \_\_\_\_\_

**Civil cases are deemed related if a previously filed case and the present case:**

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or  
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or  
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or  
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

**IX. VENUE:** (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.  
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
LOS ANGELES	

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.  
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	DENTON COUNTY

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.  
**Note: In land condemnation cases, use the location of the tract of land involved.**

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
LOS ANGELES	

\* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

**Note:** In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER): \_\_\_\_\_

Date Nov. 5, 2012

**Notice to Counsel/Parties:** The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))